



OPP General Notes – February 19, 2019

1. **PRIA** – PRIA 3 expired on February 15th, and Rick confirmed that a statement was sent to the Press Office and also posted on OPP's PRIA webpage. Alex asked for a comparison of PRIA 3 and PRIA 4, with high level improvements that are beneficial to EPA and stakeholders as well as impacts on growers if PRIA 4 is not passed. Alex and Tate would like to use this information to engage with Congress on PRIA 4 passage. Following the General, Steve Schaible sent the requested information to the OCSPP IO.
2. **Follow-up to Chestnut Briefing** – The American Chestnut Foundation (ACF) reached out to BPPD last year to describe the OxO Chestnut and request a determination on whether it contains a PIP, and thus is considered a pesticide. OPP subsequently determined that OxO Chestnut contains a PIP, and now ACF would like OPP to reconsider its determination. Alex asked if OPP can make the decision soon. Ed reached out to OGC's senior management for counsel. Nancy would like a timeline and background on the level of effort to develop and finalize the rule.
3. **Schedules for Biotech Rules (PIPs and Genome Editing)** – Rick said he has the high-level milestones for the two biotech rules. He thinks the proposal for the Genome Editing rule will be ready to go out in February. He also thinks the PIPs rule will be ready to go in October as a proposal. Nancy would like steps for internal milestones for both rules.
4. **Devices Follow-up** – There was discussion on the need for the Program to make a decision on whether devices are considered a pesticide. Ed suggested issuing a FRN, using a decision tree to solicit public comments. The OCSPP IO agreed.
5. **EWG Petition on Glyphosate** – Rick informed the OCSPP IO that the Environmental Working Group (EWG) submitted a petition requesting modification of tolerances for residues of glyphosate in or on oats. For petitions

Commented [DD1]: Not sure this accurately reflects the conversation.

that meet the Agency's requirements, EPA must publish a Notice of Filing within 30 days of making that determination. OPP has been consulting with OGC to determine if it meets Agency requirements for a petition seeking to modify tolerances. The DAAs requested additional information and gave the clearance to start the process to seek public comment on the petition through an FRN. Following the General, Rick sent to the OCSPP IO a briefing paper and email from OGC on the issue.

6. **Comments on LRM Respirator Changes** – Nancy recently asked to see the comments that OPP received on the respirator descriptions in the Label Review Manual. Nancy reviewed the comments and thought they were technical, but good.
7. **Chlorpyrifos** – After reviewing the requested timetable on milestones, the DAAs would like to schedule a meeting to better understand the comments received on the proposed rule and the data.

Waiting for OCSPP IO Feedback:

- Pollinator Presentation for Administrator – sent revised slides 2/21 based on feedback from Alex
- Follow-up to Atrazine Eco Risk Assessment Briefing
- Feedback on Response to Nanocopper petition (sent 12/21)
- Glyphosate: Next Steps/Timetable for Registration Review, RTC to Comments on Human Health Risk Assessment, and Process for EWG Petition – (Sent 2/7)
- Sent petition briefing paper on 2/20
- Paraquat Follow-up Questions (Sent 2/10)
- CDA Copper Clinical Studies (Sent 2/11)
- Comments on PREP RFA (Sent 2/3)
- Feedback on OPP changes to the NPM Guidance (Sent 2/8)
- Trilateral Meeting Travel Justification (Sent 2/11)
- Decision on Chestnut Status (Follow-up to 2/12 briefing)
- Device Determination (Follow-up to 2/12 briefing)
- Dicamba Field Study Protocols (sent 2/14)
- Response to OCSPP comments on AEZ proposed rule and Cost Analysis (sent 2/13)
- Chlorpyrifos Timeline – (sent 2/19)
- Slide decks for OPP Overview, Pesticide 101, Registration Review 101, Registration 101 (sent 2/14)
- Animal Alternatives Briefing – (resent 2/22) Addressing comments received from OCSPP-IO

OPP to send to IO

- Bio-stimulants – response to comment on taking comment on definition
- List of what OPP has put out for public comment in the last 5 years and what is the priority and schedule for responding and finalizing
- Chlorpyrifos: Comments on Meeting Summaries
- Periodic Nootkatone Updates: Next milestone is TOXSAC on 11/30
- Strategy for Kaolin Clay Products
- Timetable for finalizing PR 98-10
- Nanosilver registration timeline
- Wolbachia Experimental Use Permit - draft rejection letter
- EJ and OPP
- Desk Statement on Glyphosate study

Upcoming Briefings/Separate Meetings for the OCSPP-IO**Priority briefings:**

- Animal Alternatives
- Pollinator Briefing for Administrator
- PPDC Overview and Policy Issues
- Chlorpyrifos

Other Briefings:

- CDA Copper Clinical Studies
- Notice of Intent (NOI)
- Organism-to-Disease Efficacy
- Structural Fumigants
- Grants Overview Meeting
- Relativity Training (FOIA)
- Synergy
- New FY-19 PRIA Measures follow-up (Charlotte asked for 30 min)
- Petitions Briefing
- Spray Drift Policy Update

- Determination of Uncertainty and Extrapolation Factors when using Irritation as a Point of Departure for Irritant and Corrosive Antimicrobial Pesticide Chemicals
- All Hands Meeting for Alex Dunn
- Farm Bill – Hemp
- Inert Ingredient Disclosure
- Overall Guidance Documents and Rules Briefing Schedule
- Animal Alternatives for Acting Administrator\
- FIFRA Fees Briefing